



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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February 23, 2006

Federal Communications Commission (FCC)
445 12th Street, SW
Washington, DC 20554

RE: DA 06-139; WT Docket No. 05-326

The Aircraft Owners and Pilots Association (AOPA), representing over 406,000 general aviation pilots nationwide, is opposed to the American Tower Corporation's (ATC) request for a waiver of 14 C.F.R. section 17.47(b), Inspection of antenna structure lights and associated control equipment. AOPA contends that granting a waiver of quarterly inspections, in light of ATC's history of non-compliance with lighting and inspection requirements, is premature at best. AOPA is fully in favor of new technology that lends to increased safety and efficiency, but recommends that the quarterly inspections continue until such technology, and ATC's use of that technology, can be thoroughly evaluated.

Tower lighting can be a potential safety issue for many general aviation operations, especially for airport traffic pattern operations. Depending on the visibility, many antennas are extremely difficult to distinguish in the air, and without proper lighting, towers can be invisible to many pilots. Lack of tower lighting has contributed to numerous fatal crashes. In December 2004, a pilot and passenger on final approach into Fullerton Airport in California collided with an unlit tower in broad daylight. The tower was destroyed and both occupants perished in the crash. Unfortunately, this accident is just one example of the importance of proper tower lighting for pilots.

Upon learning of ATC's recent history of violations for non-compliance with tower lighting, inspection, and registration regulations, AOPA strongly recommends that ATC be required to continue to inspect towers quarterly for proper operation of the remote monitoring system. Until the new technology can be thoroughly evaluated and ATC's responsiveness to those outages is tracked, it is imperative that quarterly inspections are maintained and ATC's current waiver application be denied.

In addition, AOPA recommends that the Federal Communications Commission (FCC) require tracking mechanisms be implemented to evaluate the remote monitoring technology and ATC's responsiveness to outages if future waiver applications are to be considered.

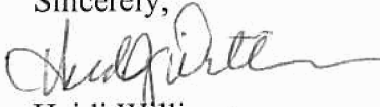
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AOPA appreciates the opportunity to provide comments on the importance of tower lighting and monitoring systems and requests that the FCC deny ATC's request for a waiver of 14 C.F.R. section 17.47(b) requiring quarterly inspections of towers with remote monitoring systems.

Sincerely,

A handwritten signature in black ink, appearing to read "Heidi Williams", with a stylized, flowing script.

Heidi Williams

Director

Air Traffic Services